

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - OCEAN COUNTY  
DOCKET NO. L-2891-14 PW

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OROS BAIS YAAKOV HIGH SCHOOL  
A nonprofit corporation of the  
State of New Jersey,  
Plaintiff,  
vs.

TOWNSHIP OF JACKSON, N.J. and JACKSON  
TOWNSHIP ZONING BOARD OF ADJUSTMENT,

Defendants.

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DEPOSITION OF: SCOTT MARTIN

DATE: THURSDAY, JUNE 13, 2019

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1 resolution, it just mentions eruvs. It doesn't even  
2 mention schools with dorms, but if you look into the  
3 body of the resolution there, it's mentioned, and I  
4 said I can't do that.

5 BY MS. RATH:

6 Q. Why were you opposed to schools with  
7 dormitories?

8 A. Because my feeling is that once you  
9 allowed one in that you would have a lot of them,  
10 and it would change the inherent beauty of the town.

11 Q. And you know the Orthodox Jewish  
12 community sends their children to schools with  
13 dorms, correct?

14 MS. TUTELO: Objection to form.

15 You can answer.

16 THE WITNESS: Yes.

17 BY MS. RATH:

18 Q. Okay, and you understand they have a  
19 need for such schools?

20 A. I'm not aware if they have a need. I  
21 am aware of their having a desire.

22 Q. So tell me, how would these dorms  
23 harm Jackson?

24 MS. TUTELO: Objection to form.

25 You can answer.

1 THE WITNESS: You are talking about  
2 building a substantial amount of schools with dorms.  
3 That would change how the town -- it would implode.  
4 The effect it would have on the infrastructure of  
5 town you can't even calculate.

6 You would -- how the town is set up  
7 right now, all the open space would be harmed. It  
8 would -- you would have traffic upon traffic in  
9 Jackson. It would change everything about Jackson,  
10 the reason people are living in Jackson.

11 And I might add most of the Orthodox  
12 families I spoke to said they moved to Jackson just  
13 for those reasons, that they love how Jackson was,  
14 how beautiful Jackson was, and they didn't want to  
15 do anything to change that.

16 BY MS. RATH:

17 Q. Okay. Well, Jackson Township is the  
18 largest municipality in the State of New Jersey, is  
19 it not?

20 A. No.

21 Q. It's not the largest municipality?

22 A. It's like the second or third. It's  
23 not the largest.

24 Q. Okay, second or third largest, and  
25 there is a significant amount of commercial and

1 institutional development in Jackson Township, is  
2 there not?

3 A. Sure.

4 Q. Okay, and in fact, the council is  
5 encouraging that type of development?

6 A. Commercial development, absolutely,  
7 yes.

8 Q. Doesn't that bring a ton of traffic  
9 and everything else you are talking about --

10 A. Not necessarily.

11 Q. -- to change the infrastructure?

12 A. Not necessarily, and commercial  
13 development also helps stabilize the tax base, as  
14 well.

15 So you have to balance these things,  
16 and again, if it was just a matter of putting one  
17 school in there, maybe you can deal with that, but  
18 it's not going to be one school.

19 My understanding is Lakewood has over  
20 160 schools with dorms. So it's not just one. You  
21 have to look at -- you have to look down the road.  
22 You can't be looking at everything as okay, I'm  
23 going to look at one little thing and make a  
24 decision. You have to look at everything.

25 Q. So you are afraid of what happened in

1 Lakewood, that is going to happen in Jackson, right?

2 A. Sure, I'm concerned. Sure.

3 Q. And with respect to the schools in  
4 Lakewood, those were all built by the Orthodox  
5 Jewish community, correct?

6 A. I don't know. You tell me.

7 Q. No, you tell me. What do you know in  
8 terms of the schools with dormitories in  
9 Lakewood Township?

10 A. I don't know for a fact. I have  
11 heard most of them are, but I don't know for a fact.

12 Q. Okay, but it's your assumption that  
13 most of them are?

14 A. It's my understanding.

15 Q. All right. So you're -- again, an  
16 APP article has stated that Martin said he didn't  
17 oppose eruvs, saying they did nothing to affect  
18 others quality of life, but said he was concerned  
19 about a portion of the settlement resolution that  
20 allowed for discussion about the possibility of  
21 building schools with dormitories in town.

22 Quote, I can't envision myself being  
23 in favor of schools with dorms, end quote, Martin  
24 said.

25 Did you make those statements?

1 different things.

2 Q. Okay.

3 A. And as you recall, if you look at our  
4 town, nobody -- there's no school with any kind of  
5 dorm inside Jackson Township of any group, of any  
6 religious affiliation, of anything.

7 Q. Six Flags has dorms, doesn't it?

8 A. For their employees, and I believe  
9 those are temporary structures.

10 Q. But you are talking about  
11 infrastructure; so what is the difference?

12 A. It's within the confines of  
13 Six Flags. It has no impact on our infrastructure.

14 Q. So why would another dorm have an  
15 impact on infrastructure?

16 A. We have no dorms.

17 Q. But if you had a school with a dorm,  
18 why is there an impact on the infrastructure when  
19 there isn't with the dorms with Six Flags?

20 A. One would not. It's what follows.

21 Q. Okay, because it opens the flood  
22 gates?

23 A. Right.

24 Q. Okay.

25 A. For anyone, for anyone.

## 1 CERTIFICATE

2

3 I, GERALDINE ADINOLFI, a Certified Court  
4 Reporter of the State of New Jersey, do hereby  
5 certify that the witness was duly sworn by me.

6 I FURTHER CERTIFY that the foregoing is a  
7 true and accurate transcript of the testimony as  
8 taken stenographically by and before me at the time,  
9 place and on the date hereinbefore set forth.

10 I FURTHER CERTIFY that I am neither a  
11 relative nor employee nor attorney nor counsel of  
12 any of the parties in this action and that I am  
13 neither a relative nor employee of such attorney or  
14 counsel, and that I am not financially interested in  
15 the action.

16

17

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18 Certified Court Reporter

19 License No. 30XI00228000

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22 Dated: June 13, 2019

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